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UNITED STATES OF AMERICA
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12 UNITED STATES DISTRICT COURT
13 FOR THE CENTRAL DISTRICT OF CALIFORNIA
14 EASTERN DIVISION

15 UNITED STATES OF AMERICA,
16 Plaintiff,
17 v.
18 64 FIREARMS AND VARIOUS
19 AMMUNITION,
20 Defendants.
21

Case No. 5:22-cv-01002
VERIFIED COMPLAINT FOR FORFEITURE
18 U.S.C. § 924(d) and 21 U.S.C.
§ 881(a)(11)
[ATF]

22
23 The United States of America brings this claim against
24 defendants 64 Firearms And Various Ammunition, and alleges as
25 follows:

26 **JURISDICTION AND VENUE**

27 1. This is a civil forfeiture action brought pursuant to 18
28 U.S.C. § 924(d) and 21 U.S.C. § 881(a)(11).

1 2. This Court has jurisdiction over this matter under 28
2 U.S.C. §§ 1345 and 1355.

3 3. Venue lies in this District pursuant to 28 U.S.C. § 1395.

4 **PERSONS AND ENTITIES**

5 4. The plaintiff is the United States of America.

6 5. The defendants are 64 Firearms (the “defendant firearms”)
7 and Various Ammunition (the “defendant ammunition”), which are more
8 specifically described in Exhibit A and are collectively referred to
9 herein as the “defendants.” The defendants were seized on or about
10 January 12, 2022, during the execution of a state search warrant at
11 the residence of Jiangjun Li (“Li”) in Rancho Cucamonga, California¹
12 (the “Li Residence”).

13 6. The defendants are currently in the custody of the Bureau
14 of Alcohol, Tobacco, Firearms, and Explosives (“ATF”), where they
15 shall remain subject to this Court’s jurisdiction pending the
16 resolution of this action.

17 7. The interests of Chinese nationals Li and Yushan Wang
18 (“Wang”) may be adversely affected by these proceedings.

19 **FACTS SUPPORTING FORFEITURE**

20 Law Enforcement Officers Execute Warrant at Li Residence

21 8. On October 25, 2021, Li used a fraudulent credit card to
22 purchase a high-end bicycle in Irvine, California. An investigation
23 revealed that Li made multiple fraudulent purchases related to high-
24 end bicycles in Southern California from October 25, 2021 through at
25 least November 6, 2021.

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28 ¹ Pursuant to Local Rule 5.2-1, only the city and state of
personal residences are set forth in this Complaint.

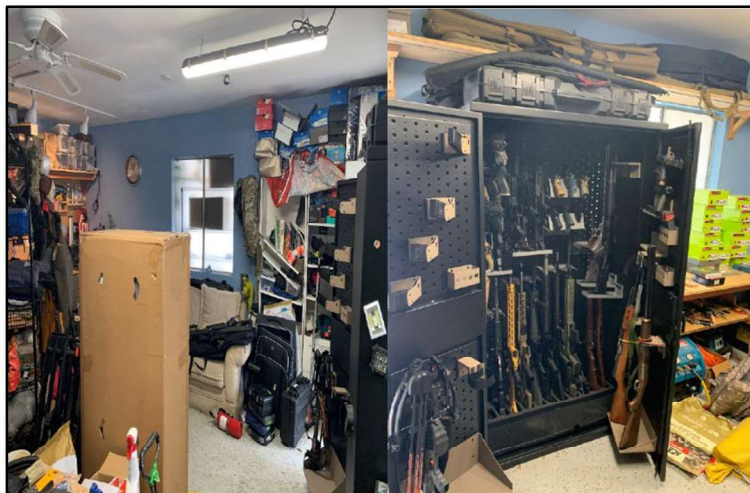
1 9. On January 11, 2022, the Irvine Police Department ("PD")
2 obtained a state search warrant for the Li Residence and Li's vehicle
3 in order to locate the fraudulently purchased bicycles and
4 accessories.

5 10. On January 12, 2022, the Irvine PD executed the search
6 warrant at the Li Residence.

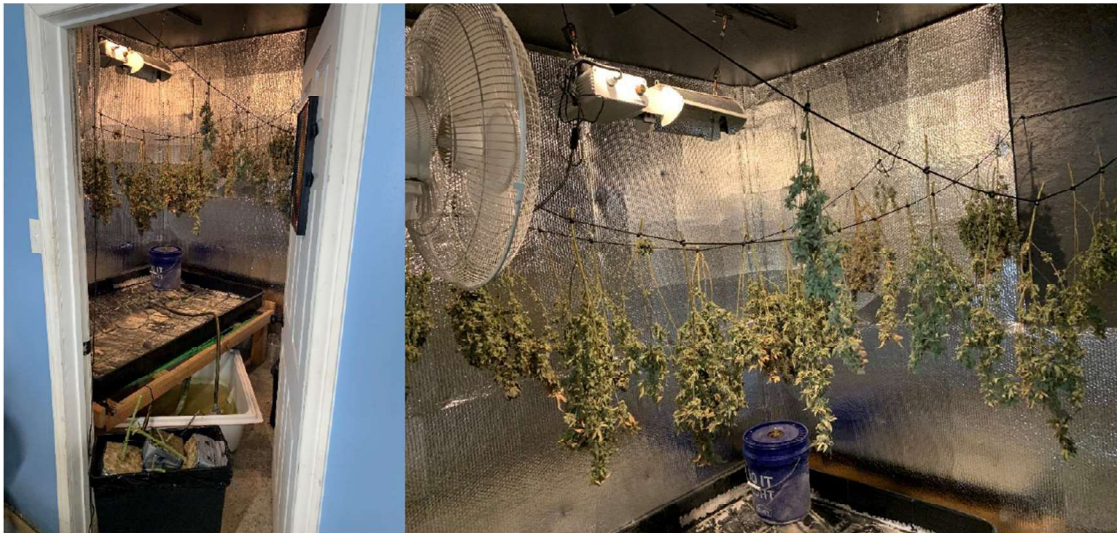
7 Law Enforcement Officers Seize The Defendants

8 11. During execution of the state search warrant at the Li
9 Residence, the Irvine PD found six fraudulently purchased bicycles in
10 the residence including in the rear shed of the house. Officers also
11 discovered in plain view a marijuana grow and dozens of firearms.

12 12. Upon discovery of the dozens of firearms, the Irvine PD
13 contacted ATF Special Agent Paul Kirwan ("SA Kirwan"). SA Kirwan
14 entered the backhouse and observed a large, unlocked cabinet
15 containing a large number of firearms. Throughout the room, SA
16 Kirwan observed large quantities of firearms parts and accessories,
17 primarily magazines. SA Kirwan also saw additional firearms
18 throughout the room and a work bench with a 3-D printer. A
19 photograph depicting some of SA Kirwan's observations is set forth
20 below:



1 13. In the same room as the firearms, SA Kirwan observed a
2 large number of supplies, chemicals, and packaging materials commonly
3 used for growing marijuana. Connected to the backhouse was a smaller
4 room with an open door that had hydroponic lighting and fans on.
5 Through the doorway, SA Kirwan saw what appeared to be a container
6 holding harvested marijuana plants. Hanging from multiple ropes,
7 like clothes lines, was recently harvested marijuana currently being
8 dried out by the fans. A photograph depicting some of SA Kirwan's
9 observations is set forth below.



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19 14. SA Kirwan began to examine some of the firearms and quickly
20 identified multiple firearms that are illegal to possess in
21 California. SA Kirwan also observed that many of the firearms were
22 loaded with ammunition or had loaded magazines nearby that could be
23 quickly loaded into the firearm. SA Kirwan also saw a work bench
24 with a 3-D printer, which can be used for illegal firearms
25 manufacturing.

26 15. SA Kirwan spoke with Li's wife, Wang, who was also present
27 at the Li Residence. SA Kirwan asked her about the firearms and
28 marijuana found in the backhouse. Wang stated that the items in the

1 backhouse belonged to Li, as well as to another unidentified third
2 party who had returned to China.

3 16. SA Kirwan walked around the house and observed a high-end
4 security camera system containing multiple security cameras located
5 at different exterior vantage points around the residence.

6 17. ATF seized 64 firearms and approximately 701 rounds of
7 assorted ammunition (i.e., the defendants), approximately 0.8
8 kilograms of marijuana, and three different containers holding
9 firearms parts and accessories.

10 **FIRST CLAIM FOR RELIEF**

11 18. Based on the facts set forth above, plaintiff alleges that
12 the defendant firearms were used or intended to be used to facilitate
13 the transportation, sale, receipt, possession, or concealment of
14 controlled substances which have been manufactured, distributed,
15 dispensed, or acquired in violation of law. The defendant firearms
16 are therefore subject to forfeiture pursuant to 21 U.S.C.
17 § 881(a)(11).

18 **SECOND CLAIM FOR RELIEF**

19 19. Based on the facts set forth above, plaintiff alleges that
20 the defendants were involved or used in knowing violation of 18 U.S.C
21 § 924(c) (possession of defendants in furtherance of a drug
22 trafficking crime). The defendants are therefore subject to
23 forfeiture pursuant to 18 U.S.C. § 924(d).

24 WHEREFORE, plaintiff United States of America prays:

25 (a) that due process issue to enforce the forfeiture of the
26 defendants;

27 (b) that due notice be given to all interested parties to
28 appear and show cause why forfeiture should not be decreed;

1 (c) that this Court decree forfeiture of the defendants to the
2 United States of America for disposition according to law; and

3 (d) for such other and further relief as this Court may deem
4 just and proper, together with the costs and disbursements of this
5 action.

6 Dated: June 17, 2022

TRACY L. WILKISON
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7 SCOTT M. GARRINGER
Assistant United States Attorney
8 Chief, Criminal Division
JONATHAN GALATZAN
9 Assistant United States Attorney
Chief, Asset Forfeiture Section

10
11 /s/ Maxwell Coll

12 MAXWELL COLL
Assistant United States Attorney

13 Attorneys for Plaintiff
14 UNITED STATES OF AMERICA
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VERIFICATION

I, PAUL KIRWAN, hereby declare that:


1. I am a Special Agent of the Bureau of Alcohol, Tobacco, Firearms, and Explosives and the case agent for the forfeiture matter entitled United States of America v. 64 Firearms and Various Ammunition.

2. I have read the above Verified Complaint for Forfeiture and know its contents. It is based upon my own personal knowledge and reports provided to me by other law enforcement agents.

3. Everything contained in the Complaint is true and correct, to the best of my knowledge and belief.

I declare under penalty of perjury that the foregoing is true and correct.

Executed June 17, 2022, in Riverside, California.



PAUL KIRWAN
Special Agent
Bureau of Alcohol, Tobacco,
Firearms, and Explosives